

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF IOWA**

IN RE:  
  
BDC GROUP, INC.,  
  
Debtor.

Case No. 23-00484

**NOTICE OF JOINT MOTION FOR  
ORDER APPROVING COMPROMISE  
AND DERIVATIVE STANDING**

TO THE DEBTOR, CHAPTER 7 TRUSTEE, ALL CREDITORS AND PARTIES  
IN INTEREST:

NOTICE IS HEREBY GIVEN that the Chapter 7 Trustee and creditor Keystone Savings Bank filed a Joint Motion for Order Approving Compromise and Derivative Standing (“Motion”) in the above-captioned case on June 18, 2024.

NOTICE IS FURTHER GIVEN that objections to said Motion, if any, shall be filed with the Clerk of the Bankruptcy Court, 111 Seventh Avenue SE, Box 15, Cedar Rapids, IA 52401, with a copy to the undersigned attorney, Chapter 7 Trustee, the United States Trustee, and the Debtor, addresses below, on or before August 26, 2024.

NOTICE IS FURTHER GIVEN that if no objections are timely filed, an order may be entered granting the relief requested without further notice or hearing.

NOTICE IS FURTHER GIVEN that if any objections are timely filed, a hearing on the Motion and objections will be scheduled by separate notice.

Dated: August 5, 2024

Respectfully Submitted,

SIMMONS PERRINE MOYER BERGMAN PLC

/s/ Abram V. Carls

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Trustee's Counsel:  
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Spencer Fane LLP  
13815 FNB Parkway  
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United States Trustee  
111 7<sup>th</sup> Ave. SE, Box 17  
Cedar Rapids, IA 52401

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 5, 2024, a copy of the foregoing document was filed with the Clerk of Court for the United States Bankruptcy Court for the Northern District of Iowa using the CM/ECF system, and served electronically on those participants that receive service through the CM/ECF System.

/s/ Abram V. Carls